



Joe Yun
Department of Water Resources
Integrated Regional Water Management Grant Program
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SENT VIA EMAIL to jyun@water.ca.gov

RE: Comments on Integrated Regional Water Management and Stormwater Flood Management Grant Programs

Dear Mr. Yun,

Thank you for accepting our comments regarding the materials presented at the Integrated Regional Water Management (IRWM) Grant Program workshop on May 13th. We look forward to the release of the draft guidelines later this summer. Our comments summarize general responses to the topics covered in the workshop.

Regional Acceptance Process: We encourage DWR to provide enough time to meet with regions and discuss an acceptance process that reflects existing resource management planning efforts designed to meet other regional objectives set by other state agencies and efforts including regional water quality control boards, Department of Fish and Game regions, and Coastal Commission regions. It is important that the overlap between efforts initiated under other regional efforts or mandates not be contrary to new IRWM regions and instead strive to leverage as many state and federal programs for common projects as possible.

Integration of Flood Management: We applaud your efforts to integrate flood management and stormwater flood management goals with IRWM planning and implementation grants. We would offer that the definition of flood management should include improvements and retrofits of existing infrastructure that has been shown via flood modeling to be an impediment to flood flows. Infrastructure should include existing roadway structures (such as raised roadbeds) that impinge on floodways and prevent flood conveyance. If demonstrated via modeling and engineering IRWM funds should provide for bridge construction that alleviates these conveyance issues to the extent possible to alleviate flood damages and public safety hazards.

Additionally on flood management outcomes from IRWM implementation projects, a cost-benefit analysis should be considered to assist in ranking and developing projects.

This cost-benefit analysis should include traditional property and business value protection benefits but also should consider benefits to the habitats of threatened and endangered species, benefits that result from reducing exposure of property and communities to natural disasters predicted to increase in severity due to climate change, and benefits associated with reductions to public safety hazards.

Green Infrastructure: We encourage DWR to consider “Green Infrastructure” as the underlying planning principal for the Climate Change standard for the IRWM Program. US EPA has stated that “at the largest scale, the preservation and restoration of natural landscape features (such as forests, floodplains and wetlands) are critical components of green stormwater infrastructure. By protecting these ecologically sensitive areas, communities can improve water quality while providing wildlife habitat and opportunities for outdoor recreation.”

Climate change standards should be developed that reflect the projected changes to California’s environment from climate change including not only water supply issues but also storm severity projections and affects on communities already prone to flooding. A planning principle such as “Green Infrastructure” could provide the foundation for creative approaches to issues such as floodplain management and protection, water quality, water supply, and watershed protection. This approach provides an infrastructure of natural features and functions (such as hydrology) that characterize the state’s water supply watersheds and other important habitats such as wetlands that provide natural buffers and filters for stormwater and flood conditions. This natural infrastructure can be protected via land purchases and easements at a strategic watershed scale.

Thank you again for the opportunity to comment on the IRWM to date. We look forward to reviewing the guidelines when completed. I can be reached at 831-625-5523 ext. 105 if you have any questions regarding our comments.

Sincerely,



Donna Meyers
Director of Conservation Programs